

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 1:18-CR- 108
:
v. : (JUDGE *Ramso*)
:
JUSTIN RASHAAD BROWN, :
:
Defendant. : (ELECTRONICALLY FILED)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
(Distribution of cocaine base)

FILED
HARRISBURG, PA
MAR 28 2018
Per *DM*
Deputy Clerk

On or about May 12, 2016, in York County, within the Middle
District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally distribute a mixture and substance
containing a detectable amount of cocaine base, a Schedule II controlled
substance.

All in violation of Title 21, United States Code, Sections 841(a)(1)
and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

(Distribution of cocaine base)

On or about June 28, 2016, in York County, within the Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

(Distribution of cocaine base)

On or about July 20, 2016, in York County, within the Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR
(Distribution of cocaine base)

On or about July 22, 2016, in York County, within the Middle
District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally possess with intent to distribute a
mixture and substance containing a detectable amount of cocaine base,
a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1)
and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

(Distribution and possession with intent to distribute cocaine base)

On or about November 16, 2016, in York County, within the
Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally distribute and possess with intent to
distribute a mixture and substance containing a detectable amount of
cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1)
and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

(Possession of firearm by previously convicted felon)

On or about November 16, 2016, in York County, within the
Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

having been convicted of a crime punishable by a term of imprisonment
exceeding one year, did knowingly possess in and affecting interstate
commerce a firearm, that being a Ruger .38 caliber revolver, Model
LCR, S/N 542-53893, said firearm having been shipped and transported
in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g).

THE GRAND JURY FURTHER CHARGES:

COUNT SEVEN

(Possession of firearm in furtherance of drug trafficking)

On or about November 16, 2016, in York County, within the
Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly possess a firearm in furtherance of a drug trafficking
crime for which he may be prosecuted in a court of the United States,
that being distribution and possession with intent to distribute cocaine
base, a Schedule II controlled substance.

All in violation of Title 18, United States Code, Section
924(c)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHT
(Possession of stolen firearm)

On or about November 16, 2016, in York County, within the
Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly possess a stolen firearm, that being a Ruger .38 caliber
revolver, Model LCR, S/N 542-53893, said firearm having been shipped
and transported in interstate and foreign commerce, knowing and
having reasonable cause to know that firearm was stolen.

All in violation of Title 18, United States Code, Section 922(j).

THE GRAND JURY FURTHER CHARGES:

COUNT NINE
(Distribution of cocaine base)

On or about January 2, 2018, in York County, within the Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT TEN

(Distribution of cocaine base)

On or about January 5, 2018, in York County, within the Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT ELEVEN
(Distribution of cocaine base)

On or about January 9, 2018, in York County, within the Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

COUNT TWELVE

(Distribution and possession with intent to distribute cocaine base)

On or about January 11, 2018, in York County, within the Middle District of Pennsylvania, the defendant,

JUSTIN RASHAAD BROWN,

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

NOTICE OF FORFEITURE

1. The allegations contained in Counts One through Five and Nine through Twelve of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant, JUSTIN RASHAAD BROWN, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses, including but not limited to approximately \$1,200 in United States currency.

3. If any such property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot
be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL




FOREPERSON, GRAND JURY

2018 - March - 28

DATE

DAVID J. FREED
UNITED STATES ATTORNEY


JAMES T. CLANCY
ASSISTANT U.S. ATTORNEY